



Eckert Seamans Cherin & Mellott, LLC
10 Bank Street
Suite 700
White Plains, NY 10606

TEL 914 949 2909
FAX 914 949 5424
www.eckertseamans.com

Sarah H. Morrissey
Direct Dial: (914) 286-2801
smorrissey@eckertseamans.com

November 29, 2018

Via ECF

Honorable Magistrate Judge Robert M. Levy
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Gary Valenti, Inc. v. Citibank, N.A.
Civil Action No. 18-cv-1575-FB-RML**

Dear Magistrate Judge Levy:

We represent Plaintiff Gary Valenti, Inc. ("Valenti") in the above-referenced matter. Pursuant to the Court's text order dated July 27, 2018 ("July 27th Order"), the deadline for discovery completion is November 30, 2018.

Pursuant to the July 27th Order, Valenti served discovery demands on Citibank on October 10, 2018 and is presently awaiting responses.

By letter dated November 8, 2018 [Dckt. No. 13], Citibank requested a pre-motion conference and sought leave to make a motion for summary judgment. Citibank further requested a stay of discovery pending the determination of Citibank's motion. By letter dated November 15, 2018 [Dckt. No. 14], Valenti opposed Citibank's request for a stay of discovery and stated the basis of opposition to summary judgment.

Citibank's request for a pre-motion conference and stay of discovery, and Valenti's opposition to the request, are pending. Both parties respectfully request an extension of the deadline to complete discovery pending resolution of the request and opposition.

Thank you for your kind attention to this matter.

Respectfully submitted,

s/ Sarah H. Morrissey

Sarah H. Morrissey, Esq.

cc. Anthony Giacobbe, Jr., Esq. (Via ECF)
Attorney for Citibank, N.A.

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